

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

v.

*

CRIMINAL NO. LKG-25-006

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THOMAS C. GOLDSTEIN,

*

Defendant

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BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

The United States of America, by and through its undersigned counsel, hereby submits this Bill of Particulars for Forfeiture of Property, providing notice pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure of its intent to seek the forfeiture of certain property in the above-referenced case.

On August 7, 2025, a federal grand jury returned a twenty-two count Superseding Indictment alleging, inter alia, that the defendant committed a violation of 18 U.S.C. § 1014, in that he made false statements on a mortgage loan application (ECF No. 159, Count 22, pg. 51).

The Superseding Indictment also included a forfeiture allegation, which provided notice to the defendant that upon conviction of the above offense, the United States will seek forfeiture pursuant to 18 U.S.C. § 982(a)(2).

The United States hereby gives notice that, in addition to the forfeiture allegation contained in the Superseding Indictment, the United States alleges, pursuant to 18 U.S.C. § 982(a)(2), that upon conviction on Count Twenty-Two of the Superseding Indictment, the defendant shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the offense, including, but not limited to, the following property: the real property located at **4323 Hawthorne Street NW, Washington, DC 20016**.

Respectfully submitted,

Kelly O. Hayes
United States Attorney

By: /s/
Adeyemi Adenrele
Assistant United States Attorney

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